

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
REGIONAL MEDICAL TRANSPORTATION INC.

NO. 19-15513 AMC
CHAPTER 11
HEARING

MOTION OF ELISA AYALA AND SAUL SANTIAGO FOR RELIEF FROM
AUTOMATIC STAY AS TO PURSUE INSURANCE PROCEEDS PURSUANT
11 USC § 362(d) OF THE BANKRUPTCY CODE

1. Movants are Elisa Ayala and Saul Santiago through their counsel Gary Brownstein, Esquire.
2. Respondent is the Debtor-in-Possession, Regional Medical Transportation, Inc.
3. Movant filed their Proof of Claims on October 18, 2019. They are holders of a Judgment against the Debtor, entered of record on 7/26/19 in the Court of Common Pleas of Philadelphia County, for damages arising out of a car accident. /
4. Movant believes and therefore avers that Debtor carried liability coverage for the 2016 Chevrolet Express Van, VIN 1GAZGPF3G1332771 at the time of the accident in which it was involved, that occurred on October 10, 2018.
5. Movant seeks relief from the automatic stay to proceed against the Debtor's insurance carrier for the subject vehicle.
6. Movant seeks the name, address and relevant insurance information for the purpose of proceeding against the Debtor's carrier only.

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Notice of Appearance

Kindly enter my appearance on behalf of the creditors, Elisa Ayala and Saul Santiago.

RESPECTFULLY SUBMITTED,

BROWNSTEIN VITALE & WEISS, P.C.



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NOTICE OF HEARING

Please take notice that creditors, Elisa Ayala and Saul Santiago will be making application for relief from the stay provisions of the Bankruptcy Code on January 6, 2020 at 11:00 A.M. in Courtroom 4 of the United States Courthouse, 601 Market Street, Philadelphia, PA.

RESPECTFULLY SUBMITTED

BROWNSTEIN VITALE & WEISS, P.C.

BY: 

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ORDER

AND NOW, this day of , 2019 upon
consideration of the Motion of Elisa Ayala and Saul Santiago For Relief From The Automatic
Stay To Pursue Automobile Insurance for injuries and damages arising from an automobile
accident that occurred on October 8, 2018, and any replies filed thereto,

It is hereby Ordered and Decreed as follows:

1. Counsel for the debtor shall provide counsel for Ayala and Santiago with the identity of
the insurance carrier, their address and policy number for the 2016 Chevrolet Express Van
involved in this accident.

2. Counsel for Ayala and Santiago is hereby afforded relief from the stay for the limited purpose of pursuing insurance proceeds from the carrier for the debtor on behalf of his clients, Ayala and Santiago.

United States Bankruptcy Court

By: Judge Ashely M. Chan

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CERTIFICATE OF SERVICE OF MOTION AND NOTICE

I certify that I am more than 18 years of age and that on 12/10/19, I served a true and correct copy of the Motion of Elisa Ayala and Saul Santiago for Relief from Stay and Notice of Motion and Response/Hearing Dates on the following persons, in the noted manner-by first class mail addressed as follows:

Regional Medical Transportation, Inc.
1695 Huntingdon Road
Huntingdon Valley, PA 19006

Kevin P. Callahan, Esquire
United States Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106-2912

John A. Gagliardi, Esquire
Wetzel Gagliardi Fetter & Lavin LLC
101 E. Evans Street
Walnut Building- Suite A
West Chester, PA 19380

See, attached matrix list (notice only)

BROWNSTEIN VITALE & WEISS, P.C.

BY:


GARY BROWNSTEIN, ESQUIRE